

# BRESSLER, AMERY & ROSS

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July 30, 2010

**VIA ELECTRONIC FILING**

The Honorable A. Kathleen Tomlinson  
United States Magistrate Judge  
Eastern District of New York  
100 Federal Plaza, Courtroom 910  
P.O. Box 9014  
Central Islip, NY 11722-9014

**Re: Transportation Insurance Company, et al. v. Park Electrochemical Corp.**  
**Civil Action No. 2:10-cv-0091**

Dear Judge Tomlinson:

This firm represents Plaintiffs in the above-captioned matter. Pursuant to the Court's May 6, 2010 Case Management and Scheduling Order [DE #16], a telephone conference is scheduled for August 4, 2010, at 11:00 a.m. The purpose of this conference is to discuss discovery status, and to discuss whether further discovery is warranted.

To date, the parties have been actively discussing document production. Unfortunately, and despite the parties' best efforts, the parties have been unable to agree on the appropriate scope of the confidentiality agreement necessary in this case. By order dated July 26, 2010 [DE #21], this Court directed the parties to submit a renewed application in order to resolve the dispute. The parties intend to do so early next week as lead counsel for the Defendant is out of the country this week. As a result, no documents have been exchanged to date. However, the parties expect to commence their respective document productions upon the resolution of the issues surrounding the confidentiality agreement.

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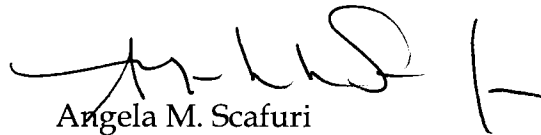
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Accordingly, the parties respectfully request that the Court adjourn the telephone conference currently scheduled for August 4, 2010 until August 25 or any date thereafter so that this Court may resolve the dispute over the confidentiality agreement and the parties may exchange documents in advance of the conference.

This request is being submitted with the consent of Defendant's counsel. The parties thank your Honor for the Court's consideration in this matter.

Respectfully submitted,



Angela M. Scafuri

AMS/cjd

cc: David N. Wynn, Esq. / Arent Fox LLP / via electronic filing  
Mark A. Angelov, Esq. / Arent Fox LLP / via electronic filing